



U.S. Department of Justice

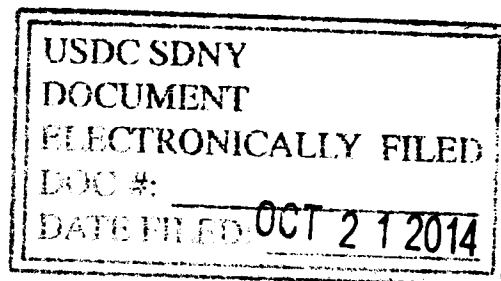
United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

October 20, 2014

BY ECF AND FACSMILE

Hon. Laura Taylor Swain
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007
Facsimile: (212) 805-0426



Re: *United States v. Daniel Bonventre, et al.*,
No. S10 10 Cr. 228 (LTS)

RECEIVED ENDORSED

Dear Judge Swain:

We write, on behalf of all parties, pursuant to the Court's October 2, 2014 Order, which notified the parties that the Court will hear oral argument regarding all forfeiture issues on October 27, 2014, and which directed the parties to file a joint letter "delineating the time each requests to be allotted for oral arguments."

Mindful of the Court's urging that the parties "avoid making repetitive or cumulative arguments," the defendants respectfully request oral argument time as follows:

Daniel Bonventre	10 minutes
Annette Bongiorno	15 minutes
JoAnn Crupi	25 minutes
Jerome O'Hara	20 minutes
George Perez	25 minutes

The defendants have indicated that they intend to address both common forfeiture issues (*e.g.*, the proper treatment for forfeiture purposes of salary received from Madoff Securities) as well as ones specific to each defendant (*e.g.*, the forfeiture of specific property).

The Government respectfully requests an equivalent amount of time, *i.e.*, a total of up to 95 minutes. Although the Government has no forfeiture-related issues that it specifically wishes to raise and anticipates using far less than the requested time, we want to ensure that we have sufficient time to address any issues raised by the defendants (especially because we are unaware of which points in particular the defendants will focus their presentation on) as well as any questions that the Court may have.

The parties have met and conferred, and no party has any objection to any other party's requested allotment of argument time. Thank you for your consideration of these requests.

Respectfully,

PREET BHARARA
United States Attorney

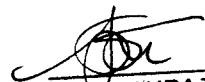
By: /s/ Matthew L. Schwartz
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(212) 637-1945

cc: BY ECF

All defense counsel

*The requested time allotments
are approved.*

SO ORDERED:

 10/20/14
HON. LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE